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May 16, 2025

By ECF

Honorable Judge Nelson S. Roman
 United States District Judge
 Southern District of New York
 300 Quarropas St.
 White Plains, NY 10601-4150

USDC SDNY
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Re: *Congregation Rabbinical College of Tartikov et al. v. Village of Pomona, NY et al*
 Docket No. 07:25-CV-01471
 File No. 250063PK

Your Honor:

This firm represents Defendants. We write to respectfully request (1) a 45-day extension of time—from May 14, 2025 to June 28, 2025 to respond to the Amended Complaint; and (2) that Defendants' deadline to respond to Plaintiff's motion for a preliminary injunction, which Plaintiff served on April 23, 2025, but has not yet filed with the Court, be extended to the same June 28, 2025 deadline. This is Defendants' first request for this relief.

Plaintiff agreed to grant a 14-day extension, but this does not allow us sufficient time to get up to speed on this case, which has a long and complex history in this courthouse. See *Congregation Rabbinical Coll. of Tartikov, Inc. v. Vill. of Pomona, NY*, 945 F.3d 83 (2d Cir. 2019); *Congregation Rabbinical Coll. of Tartikov, Inc. v. Vill. of Pomona*, No. 20-CV-6158 (KMK), 2024 WL 4263205 (S.D.N.Y. Sept. 23, 2024), *aff'd*, No. 21-2822, 2022 WL 1697660 (2d Cir. May 27, 2022). The extra time Defendant requests is necessary to give us sufficient time to investigate the new claims and formulate a response to both the Amended Complaint and the preliminary injunction motion. Additionally, Mr. Leo Dorfman, who will lead defense counsel on this case, will be on trial in the Eastern District through next week.

Thank you for your consideration of this matter.

Over Plaintiff's objection, the Court GRANTS Defendants a 30-day extension of the time to respond to both Plaintiff's Amended Complaint and Motion for a Preliminary Injunction by June 14, 2025. The Clerk of Court is kindly directed to terminate the motion at ECF No. 26.

Respectfully submitted,
 SOKOLOFF STERN LLP

DANIELLE L. JACOBS

Dated: May 22, 2025
White Plains, New York

SO ORDERED:

NELSON S. ROMÁN
 United States District Judge

cc: All Counsel of Record (Via ECF)

MEMO ENDORSED